

**THE PRITCHARD LAW FIRM, PLLC
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: §
§
SHAH NAWAZ FARASH, DEBTOR § **CASE NO. 22-41353-mxm13**
NIGHAT SHAH FARASH, DEBTOR §
§ **CHAPTER 13**

OBJECTION BY NATURAL FASHIONS, INC. TO DEBTORS' PLAN

COMES NOW, NATURAL FASHIONS, INC. and objects to the Debtors' Chapter 13 plan as follows:

1. The **Creditor Natural Fashions, Inc.** is a secured creditor of the Debtors as a judgment creditor having abstracted a judgment it obtained in state court.
2. Further, in a previous Chapter 7 case, the debt owed to Natural Fashions, Inc. was found to be not dischargeable, a copy of said Judgment is attached.
3. The Debtors' plan does not adequately provide for payment of the NATURAL FASHIONS, INC. debt. The plan provides for payment to NATURAL FASHIONS, INC. as an unsecured creditor and offering a very small payout.
4. The Debtors are not utilizing all of their disposable income toward their bankruptcy plan and payment of their creditors, including Movant NATURAL FASHIONS, INC.
5. The Debtors' plan does not adequately provide for payment of the NATURAL FASHIONS, INC. debt.

6. This plan is not proposed in good faith as to NATURAL FASHIONS, INC.
7. The plan should not be confirmed as presented and the case should be converted to a chapter 7, or the Debtors be required to provide a plan that provides proper treatment of NATURAL FASHIONS, INC. claim.

Wherefore, NATURAL FASHIONS, INC. prays the Court deny confirmation of the Debtors' plan and such relief as it may be entitled.

Respectfully submitted,
THE PRITCHARD LAW FIRM, PLLC

/s/ David L. Pritchard

BY: David L. Pritchard
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing to Objection was mailed to the following people by placing same in the United States Mail, postage prepaid, properly addressed to and/or Pursuant to the ECF guidelines:

Warren V. Norred
Norred Law PLLC
515 E. Border Street
Arlington, Texas 76010

Shah Nawaz Farash
Nighat Shah Farash
6833 Beverly Glen Dr.
Fort Worth, Texas 76132

Trustee
Pam Bassel
Office of The Standing Ch.13 Trustee
860 Airport Freeway
Suite 150
Hurst, Texas 76054

U.S. Trustee
United States Trustee

1100 Commerce Street
Room 976
Dallas, Texas 75202

Date: August 9, 2022

/s/ David L. Pritchard
By: David L. Pritchard

EXHIBIT “A”



CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Signed July 13, 2020

United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN THE MATTER OF:
SHAH NAWAZ FARASH and
NIGHAT SHAH FARASH

DEBTORS

NATURAL FASHIONS, INC.,

Plaintiff,

vs.

SHAH NAWAZ FARASH and
NIGHAT SHAH FARASH

Defendants.

CASE NO. 18-42120-rfn7

CHAPTER 7

ADVERSARY PROCEEDING
NO. 18-04160-elm

FINAL JUDGMENT

On September 11 and 12, 2019, the Court conducted a bench trial in the above-captioned adversary proceeding to determine whether the judgment entered by the Eastern District of California in *Natural Fashions, Inc. v. Best of Kashmir, et al.*, Civil Action No. 2:15-cv-0033-MCE-CMK, Dkt Nos. 25 and 26 (E.D. Cal., March 30, 2016) as domesticated by the District Court of Tarrant County, Texas, 141st Judicial District in Case No. 141-286054-16 (the “Judgment”) is nondischargeable under 11 U.S.C. § 727 pursuant to 11 U.S.C. § 523(a)(6). On June 12, 2020, the Court held a hearing (the “Hearing”) announcing its decision and detailing its reasoning on the record.

For the reasons fully explained at the Hearing, it is ORDERED, ADJUDGED, and DECREED that the Judgment entered in Plaintiff Natural Fashions, Inc.’s favor and against Defendants Shah Nawaz Farash and Nighat Shah Farash is not discharged under 11 U.S.C. § 727(a) and is a nondischargeable debt under 11 U.S.C. § 523(a)(6).

END OF ORDER

Order prepared by:

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